



"Winters, Karen"  
<KWinters@ssd.com>  
06/29/2006 04:54 PM

To Jason.Barbeau@usdoj.gov, Catherine  
Garypie/R5/USEPA/US@EPA, Alan.Tenenbaum@usdoj.gov  
cc  
bcc



Subject FW: Exhibit B

History: This message has been forwarded.

Sorry about that. Attached is my redline of the version of Exhibit B that Brian Monroe circulated yesterday. Bob didn't like the suggested revisions to the last bullet under the River Rouge Site Investigation, so I'm planning to reinclude the original language. Again, sorry about the oversight. You can see that it's what we talked about earlier this afternoon. Please let me know if you have any concerns about suggested deletions (which are the same for each of the sites) and I will send the execution copy out.

-----Original Message-----

From: Jason.Barbeau@usdoj.gov [mailto:Jason.Barbeau@usdoj.gov]  
Sent: Thursday, June 29, 2006 5:38 PM  
To: Winters, Karen  
Cc: Alan.Tenenbaum@usdoj.gov; Garypie.Catherine@epamail.epa.gov  
Subject: RE: Exhibit B

We haven't seen any version today. Can you please send us the latest version for our review? Thanks.

-----Original Message-----

From: KWinters@ssd.com [mailto:KWinters@ssd.com]  
Sent: Thursday, June 29, 2006 5:34 PM  
To: Barbeau, Jason (ENRD)  
Cc: Tenenbaum, Alan (ENRD); Garypie.Catherine@epamail.epa.gov  
Subject: RE: Exhibit B

I got a call from Bob Reichel indicating that with the changes he gave me this afternoon (which I incorporated) he's fine. I'd like to circulate the execution copy yet this evening.

-----Original Message-----

From: Jason.Barbeau@usdoj.gov [mailto:Jason.Barbeau@usdoj.gov]  
Sent: Thursday, June 29, 2006 5:30 PM  
To: Winters, Karen  
Cc: Garypie.Catherine@epamail.epa.gov; Alan.Tenenbaum@usdoj.gov  
Subject: RE: Exhibit B

Karen,

That's good news on the 4(c) language. Catherine and I will need to check in with MI and get back to you - tonight or first thing tomorrow.

-----Original Message-----

: KWinters@ssd.com [mailto:KWinters@ssd.com]  
: Thursday, June 29, 2006 5:10 PM  
: Barbeau, Jason (ENRD); PBrooks@ssd.com  
Subject: RE: Exhibit B

Jason-are you OK with these? Everyone else is. Also, we will delete the language in 4(c) re consent being unreasonably withheld etc.

-----Original Message-----

From: Brooks, Patrick J.  
Sent: Thursday, June 29, 2006 5:08 PM  
To: Jason.Barbeau@usdoj.gov; Winters, Karen  
Subject: FW: Exhibit B

Karen:

I'm on call with Jason and he was not aware that MI is done. You two should touch base.

-----Original Message-----

From: Robert Reichel [mailto:reichelb@michigan.gov]  
Sent: Thursday, June 29, 2006 4:09 PM  
To: wvawest@ameritech.net; Jonathan Pierce; Lewis Putman Jr.; Winters, Karen; ssamuels@ssd.com  
Cc: Paul.Harper@eaglepicher.com; Brooks, Patrick J.  
Subject: Re: Exhibit B

Thanks. The proposed revisions are acceptable with one minor exception. We request that the last sentence of the final bullet point under River Rouge Site Investigation be revised to read: "The number of sampling parameters for the future site investigation sampling may be reduced by agreement of the Custodial Trustee and the Lead Agency."

Please call me if you have any questions.

Robert P. Reichel  
Assistant Attorney General  
Environment, Natural Resources & Agriculture Division P. O. Box 30755  
Lansing, MI 48909 517-373-7540 (Phone) 517-373-1610 (Fax)

>>> "Winters, Karen" <KWinters@ssd.com> 6/29/2006 3:33:06 PM >>>  
Attached please find a revised draft of the Exhibit B forwarded to us yesterday by Brian Monroe with my suggested revisions to the document. The suggested revisions are reflected in track changes. Please let me know if these are acceptable and I will circulate an execution version of the Settlement Agreement and related exhibits. Thanks!

Karen A. Winters, Esq.  
Squire, Sanders & Dempsey, L.L.P.  
1300 Huntington Center  
41 South High Street  
Columbus, Ohio 43215-6197  
Office: +1.614.365.2700  
Fax: +1.614.365.2499  
Direct Dial: +1.614.365.2750  
kwinters@ssd.com  
www.ssd.com

Beijing    Bratislava    Brussels    Budapest    Caracas    Cincinnati  
Cleveland    Columbus    Hong Kong    Houston    London    Los Angeles

Madrid Miami Milan Moscow New York Palo Alto Phoenix  
Prague Rio de Janeiro San Francisco Santo Domingo Shanghai  
Tallahassee Tampa Tokyo Tysons Corner Warsaw Washington DC  
West Palm Beach

Associated Offices: Bucharest Buenos Aires Dublin Kyiv Santiago

NOTICE: This email message and all attachments transmitted with it are intended solely for the use of the addressees and may contain legally privileged, protected or confidential information. If you have received this message in error, please notify the sender immediately by email reply and please delete this message from your computer and destroy any copies.